

STEPHANIE M. HINDS (CABN 154284)
United States Attorney
MICHELLE LO (NYRN 432163)
Chief, Civil Division
CHRISTOPHER F. JEU (CABN 247865)

150 Almaden Boulevard, Suite 900
San Jose, California 95113
Telephone: (408) 535-5082
Fax: (408) 535-5066
christopher.jeu@usdoj.gov

Attorneys for Federal Defendant Deb Haaland

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TINA POTTS LINDROOS,

Plaintiff,

v.

DEB HAALAND, United States Secretary
of the Interior,

Defendant.

Case No. 20-cv-06897-EMC

**STIPULATED REQUEST TO EXTEND
DATE TO FILE SECOND AMENDED
COMPLAINT AND [PROPOSED] ORDER**

Pursuant to Civil Local Rule 6-2, Plaintiff Tina Potts Lindroos and Defendant Deb Haaland, the U.S. Secretary of the Interior, respectfully request to extend the deadline to file a Second Amended Complaint by two weeks, so that the parties may finalize a Settlement Agreement.

WHEREAS, on February 15, 2022, the Court urged the parties to meet and confer to settle the case; and it set March 15, 2022, as the deadline for Plaintiff to file a Second Amended Complaint if the Parties do not reach settlement. ECF No. 61.

WHEREAS, the parties have been negotiating settlement, and they have reached settlement in principle.

WHEREAS, the parties have been working on the settlement agreement, but they need additional

1 time to finalize the terms of the settlement agreement.

2 WHEREAS, it would conserve judicial and party resources to extend the deadline for Plaintiff to
3 file a Second Amended Complaint, as an extension would help avoid motion practice regarding the
4 merits of Plaintiff's Second Amended Complaint.

5 THEREFORE, Plaintiff Tina Potts Lindroos and Defendant Deb Haaland, the U.S. Secretary of
6 the Interior, respectfully request that the Court extend the date to March 29, 2022, for Plaintiff to file a
7 Second Amended Complaint.

8 Respectfully submitted,

9 Dated: March 15, 2022

10 STEPHANIE M. HINDS
11 United States Attorney

12 By: /s/ Christopher F. Jeu
13 Christopher F. Jeu
14 Assistant United States Attorney
Attorneys for Defendant
Deb Haaland, U.S. Secretary of the Interior

15 *As the ECF User whose identification and password are being used to file this Stipulation, I attest under*
16 *penalty of perjury that Plaintiff's counsel has concurred in the filing of this document.*

17 THOMAS DIMITRE ATTORNEY AT LAW LLC

18 By: /s/ Thomas Dimitre
19 Thomas Dimitre
20 Attorney for Plaintiff
21 Tina Potts Lindroos
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